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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**EUGENE DIVISION**

**NICOLE GILILLAND, AN INDIVIDUAL,**

Plaintiff,

vs.

**SOUTHWESTERN OREGON  
COMMUNITY COLLEGE DISTRICT BY  
AND THROUGH ITS BOARD OF  
EDUCATION, AN OREGON COMMUNITY  
COLLEGE DISTRICT AND BOARD;  
SOUTHWESTERN OREGON  
COMMUNITY COLLEGE, AN OREGON  
COMMUNITY COLLEGE,**

Defendants.

Case No. 6:19-cv-00283-MK

**STIPULATED MOTION TO  
STAY EXPERT DISCLOSURE  
DEADLINES**

Pursuant to LR 7-1 of the United States District Court for the District of Oregon, the parties have conferred on this Stipulated Motion to Stay Expert Disclosure Deadlines and have agreed to the relief sought.

Due to the upcoming holiday season and the ongoing effects of Covid, including the recent Omicron variant, Plaintiff requires additional time within which to designate expert

witnesses under Federal Rule of Civil Procedure 26. Currently, the deadline for designating affirmative expert witnesses is Monday, January 3, 2022. (ECF 34.)

Presently, the Court has a scheduling conference set in this matter for January 11, 2022, to address, among other matters, the pre-trial schedule. (ECF 66.) Plaintiff anticipates requesting a modest extension of time to designate expert witnesses at that conference.

Accordingly, Plaintiff requests that the Court stay the existing expert witness disclosure deadlines until the matter can be taken up at the January 11, 2022, scheduling conference.

DATED this 28th day of December 2021.

/s/ Brandon J. Mark  
Brandon J. Mark (OSB No. 041613)  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 28, 2021, I electronically filed the foregoing Stipulated Motion to Stay Expert Disclosure Deadlines with the Clerk of the Court using the CM/ECF system which will send electronic notification to of such filing to all CM/ECF participants.

/s/ Brandon J. Mark